



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

9J0000694232

INSTALLATION ADDRESS

GLUCK BARREL AND FIBRE DRUM CO
85 TRIANGLE BLVD
CARLSTADT

NJ 07072

85 TRIANGLE BLVD
CARLSTADT

NJ 07072



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DIVISION OF HAZARDOUS WASTE MANAGEMENT
 CN 028
 Trenton, N.J. 08625-0028
 (609) 633-1408
 Fax # (609) 633-1454

92 FEB 24 PM 1:45
 PERMITS ADMINISTRATION
 BRANCH

Laura J. Livingston, Chief
 USEPA, Region II
 26 Federal Plaza
 New York, New York 10278

Feb. 20, 1992

*N, R, 7, 2
 X, R
 Dha
 2/27/92*

Dear Ms. Livingston:

Enclosed is a copy of a letter from Gluck Barrel & Fiber Drum Co requesting the following information changes(s):

1. Company Name _____
2. Corporate Name/Ownership _____
3. Company Contact _____
4. EPA ID Number _____
5. Notification Status to: TSD _____
 Transporter _____
 Generator _____
 Non-Handler _____
 S.Q. Generator _____
6. Generator/Company Closure _____
 DELIST EPA ID. NO NJD000694232 AS PER NJDEP _____
7. Other INSPECTION REPORT RECOMMENDATIONS (SEE ATTACHED)

Please make the indicated changes to your RCRA mailing address file. Your attention in this matter would be greatly appreciated.

Sincerely,


Ferd Scaccetti

Ferd Scaccetti,
 Bureau of Manifest & Information Systems

CB:dag
 Enclosure



MEMO**NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION**

TO Philip Cole, Section Chief, BAM January 30, 1992
DATE
FROM Jeffrey Sterling, Acting Section Chief, MFO-RCRA 
SUBJECT Status of NJD 000694232 & NJD 069303790

A recent RCRA inspection at Tunnel Barrel & Drum Co., Inc. (NJD001601152) revealed that Monocrete Container & Drum Co. (NJD069303790) and Gluck Barrel & Fiber Drum Co. (NJD000694232) are no longer in business. Tunnel Barrel & Drum purchased the business accounts of these companies years ago.

Since the above referenced companies no longer exist the subject EPA ID numbers, NJD000694232 and NJD069303790, should be deactivated.

If you have any questions about this memo please call John Dotterweich of my staff at (201)669-3913.

E42:G27

c: File
John Dotterweich

TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

BARRELS AND DRUMS

85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 27, 1983

Mr. Alphonse Iannuzzi Jr.
1259 Route 46
Parsippany, N.J. 07054

Dear Sir:

After meeting with you yesterday and having had our plant and records inspected by you, ~~I would like to try and explain the one violation which arose as a result of your inspection.~~

To start, ~~two years ago when you first inspected our plant, the one problem which you discovered was a spill of some unknown alkaline liquid.~~ The spill was located on the ground in an area behind our building, which was approximately 3' x 10' and about $\frac{1}{2}$ " deep into the soil. ~~Upon your recommendation we immediately picked up the contaminated soil and put it in three 30 gallon steel open head drums so it could be removed.~~ We also had the entire area macadamized so that in the event of another spill the liquid or solid could be absorbed by speedi-dry, saw-dust etc.

We then contacted Mr. ~~Barone~~ and discussed the removal of the contaminated soil (which you indicated was considered a hazardous waste) and we were assured that he had the proper permits and authorization to handle it. We had known Mr. Barone for a number of years because he was, we thought, primarily in the barrel and drum business and we did in fact buy empty fibre drums from him from time to time. Also, because we had our own truck maintenance shop we did some repair work for him when he first started on his own in the drum business. These facts bring us to the point where ~~we had just done some maintenance work on one of his trucks and we agreed to do the price of removal of one 3 barrels of hazardous waste off our company bill so that payment would be sent in the mail as soon as possible and as you know this was never done.~~ He then promised us that all the paper work needed would be sent in the mail as soon as possible and as you know this was never done. Not too soon after that he made quite a splash in the Bergen Record newspaper and we haven't heard from him since.

Because of the small quantity of hazardous material and the fact that I thought the problem was taken care of, I completely forgot about the entire situation until you showed up for your inspection. Be assured that if I has realized the problem, I would have done everything in

my power to rectify the situation and also, we did not in any way mis-handle or ship a hazardous waste other than failing to get the paper work from Mr. Barone.

~~I will though, continue to try and contact Mr. Barone in order to secure the paper work needed to rectify our problem.~~ If there is any other guidance or help you can offer me with regard to this situation, please do not hesitate to call.

Finally, as we discussed, our three companies, Tunnel Barrel & Drum Co., Inc., Monocrete Container & Drum Co., and Gluck Barrel & Fiber Drum Co., have filed with the U. S. Environmental Protection Agency to be removed from their list of handlers, storers and generators of hazardous waste. We did request to keep our transporter status in order to protect ourselves against the future change in regulations which could possibly affect our business.

Thank you again for your help and consideration during your inspection.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.


Joseph Binder Jr.

JB/cy

Gluck - 000 694232 - Transp. —
Monocrete - 069303790 - " —
Tunnel Barrel - 001 601152 - " —

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☒

HWM (TSD) facility ☒

Copy of report sent to the facility ☐

FEB 23 12 05 PM '83
ENVIRONMENTAL PROTECTION
NEW YORK, N.Y. 10001

20

Facility Information

Name: Gluck Barrel & Drum Co.

Address: 85 Triangle Blvd.
Carlstadt, NJ

EPA ID#: NJD000694232
~~NJD000694232~~

Date of Inspection: 1-25-83

Participating Personnel

State or EPA Personnel: Alphonse Iannuzzi Jr.

Facility Personnel: ① Anthony Urcioli,
President, ② Joseph Binder, Secretary & Treasurer

Report Prepared by Name: Alphonse Iannuzzi Jr.

Agency: DEP

Telephone #: 201-648-3669

Approved for the Director by: _____

Summary of Findings

Facility Description and Operations

Gluck Barrel & Drum Co. (NJ0000694232), Tunnel Barrel & Drum Co. Inc. (NJ0000601152), and Monocrete Container Co., Inc. (NJ00069303790) are all the same company operating out of one building on 85 Triangle Blvd. Carlstadt, NJ. All three registered as a Gen, Trans, & TSDF. The reason for having all three co's listed at the same address is due to Tunnel buying out Gluck and Monocrete. Since Tunnel didn't want to lose any of the other two company's customers they kept their name. Since they maintain Gluck and Monocrete's names they also registered all three company's for hazardous waste activity.

This company is a drum reconditioner of ^{empty} fiber pack drums. Used fiber pack drums are bought from customers, washed, wiped, or steamed out (wash water is discharged to Bergen County utilities Authority Little Ferry, NJ. sewage treatment plant), painted, and sold to customers as reconditioned drums. Empty metal and plastic drums are received, categorized according to size and type, and sold to drum reconditioners. No cleaning of these drums occur on site. Metal drums are sold to ① Acme Albert 1050 Grand Ave. Brooklyn, NY, ② Jacob Kline Cooperage Allentown, PA., and ③ Central steel Drum Newark, NJ. Plastic drums are sold to State Steel Drum Co. Camden, NJ. Some of the empty metal drums received once contained hazardous waste, other drums on noted on site had corrosive and flammable labels on them. Tunnel registered as a Gen, Trans, TSDF, due to recommendations

Facility Name

Date of Inspection 1-25-83

Gluck Barrel

A-2

EPA ID No.

HW/EF No.

1150084009372

Comments, observations, summary

from their lawyers. After they realized that the regulations (RCRA) did not include empty drums they had already registered with EPA. Attached is a letter from Mr. Binder ⁽¹⁻¹²⁻⁸³⁾ representing all three company's to EPA Washington, D.C. accompanying an EPA 1981 status sheet for non-regulated Generators (for all 3 company's) and a ~~non-regulated~~ facility form (for Tunnel). This letter states that all three company's would like to remove their General TSPF status and keep their trans. status.

Three 30 gal. drums of caustic spill cleanup material were accumulated in 3/81. This spill was noted during an initial RCRA inspection of Tunnel by me on 3/9/81. (See page 13). Tunnel does not have a manifest for these drums and stated that Barone Barrel & Drum Paterson, NJ removed these drums sometime in 4/81. Without a manifest Tunnel used to have a truck repair outfit operating out of the same building "M & C Trucking". Barone had brought one of its trucks in for repair, and Tunnel had deducted the price for disposing of these drums from the repair bill ^{\$300} (See attached repair bill dated 4-30-81). Mr. Urciali stated that Barone never left a manifest because he did not have a form on his truck. He never brought back a form to Tunnel. Tunnel had repeatedly tried to obtain a manifest from Barone, but could not contact him by phone. Mr. Urciali stated that someone by the name of Tarrats was contacted at Barone, but he did not know his exact address. He said that a few weeks after this shipment he had read about Barone getting into trouble with the state in a newspaper.

Alphonse Lang

Signature of Inspector

Signature of Facility Representative

Facility Name

A-3

Date of Inspection

1-25-83

Gluck Barrel

EPA ID No.

HW/EF No.

NJ0084009372

Comments, observations, summary

Mr. Urcioli was told that this shipment was in violation of both DEP & EPA's regulations.

Facility Inspection

The facility inspection indicated that there were empty fiber and metal drums stored inside of the building. Some metal and plastic drums were stored outside of the building in an ally between their building and the next building north of Tunnel. A spill, approx. 12'x3', of a brown-yellow material ^{on asphalt} in a puddle of water in this ally was noted. Mr. Urcioli determined that this was paint use to paint fiber drums. He had one of his men put saw dust on it during the inspection. Mr. Urcioli was told that any spill residue from drums labeled flammable, corrosive, or any other potentially hazardous material must be cleaned up and placed into a drum immediately. He agreed to do this.

Mr. Binder stated that he will send a letter to me concerning the disposal of the caustic spill material sent to Bardone and also include this copy with the NJDEP annual manifest report.

Alphonse Longi
Signature of Inspector

Signature of Facility Representative

-B-

Describe the activities that result in the generation of hazardous waste.

The only haz. waste generated at this facility on a regular basis is waste crankcase oil from servicing their trucks (N.J. HAZ. waste as of 1-83).

During a 3/9/81 initial RCRA inspection^{by A. Tannuzzi, of NJDEP} of Tunnel Barrel & Drum ^{inspectors} a spill of caustic material (determined to be caustic by pH paper test) was noted on soil. Three 30 gal. drums of contaminated soil were generated from this cleanup. This is the only other waste produced.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

Only 50 gals. of waste crank-case oil is stored in a 250 gal. capacity storage tank. This oil is removed by Bills Waste Oil 430 Ridge Rd. Lyndhurst, N.J. N.J. SWA transporter permit # S-6629AB to BIL Oil Newark, N.J.

Tunnel does not have any receipts for the removal of waste oil on file. They did have Bills Waste Oil's permit #, address, etc. written on a blank Bills waste oil receipt.

The waste oil tank is stored out side of the building. This tank was unlabeled, stored on asphalt, had no protection from vehicles backing into it, and had some spillage at its base (sludge - small amount). Mr. Urcioli stated that the spillage will be cleaned up and a barrier protecting the tank will be installed. The words "waste oil" were written on the tank in red paint during the inspection. Mr. Urcioli was informed of N.J.'s new waste oil regulations and was told to call DEP at 609-292-5560 for a copy of these reg's.

Is there reason to believe that the facility has hazardous waste on-site?

a. If yes, what leads you to believe it is hazardous waste?

Check appropriate boxes:

- ☐ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☒ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) *waste oil is a non-haz. waste.*

*Mr. Urcioli stated that His Co. does not
Gen, Trans, or TSP. hazardous waste. see comments
section.*

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

262.11 - Hazardous waste determination

- 1) Did the generator test its waste to determine whether it is hazardous?
- Is the waste hazardous?
- 2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

YES NO N/A

— — X
— — X
— — X

company states it does not Gen. haz. waste.

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

X — —

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

to Barone Barrel & Drum Co. Paterson, N.J. One unmanifested shipment of high pH spill cleanup material. Three 250 gal. waste oil shipments.

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. Number?
- the transporters name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

— — —
— — —
— — —
— — —
— — —
— — —
— — —

N/A
no manifest used for one spill cleanup shipment or waste oil.

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

— X —

262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?

— — X

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

— — X

No manifest used for shipment of spill cleanup material noted during the 3/9/81 RCRA inspection performed at Tunnel Barrel & Drum. Waste oil is not manifested.

YES NO N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) _ _ _
- 2) Label each package according to DOT (i.e., 49 CFR 172) _ _ _
- 3) Mark each package according to DOT (i.e., 49 CFR 172) _ _ _
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) _ _ _

N/A

262.34 Accumulation Time

1) How is waste accumulated on-site?

☐ Containers

☒ Tanks *waste oil tank, one 250 gal. tank.*

☐ Surface impoundments (complete EWMF checklist)

☐ Piles (complete EWMF checklist)

2) Is waste accumulated for more than 90 days? X _ _

If yes, complete EWMF checklist *waste oil*

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection? _ _ X

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements? _ X _

tank only

Tank not labeled.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

TSD Checklist is completed.

Note: Since this co. does not gen. > 1001 gals. waste oil within a 90 day period or even in a year, they do not have to maintain manifest records for waste oil only shipping documents or receipts have to be maintained as 91-83.

N/A TSD completed

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 265 - Subpart I Containers

YES NO N/A

265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).

265.171 - Do the containers appear to be in good condition, not in danger of leaking?

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

265.172 - Are hazardous waste stored in containers made of compatible materials?

If not, please explain.

265.173(a) - Are all containers closed except those in use?

265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

265.174 - Is the storage area inspected at least weekly?

265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?

265.177 - Are incompatible wastes stored separate from each other?

N/A TSD - completed.

40 CFR 265 Subpart J - Tanks

YES NO N/A

265.190 1) What are the approximate number and size of tanks containing hazardous waste?

2) Identify the waste treated/stored in each tank.

265.192 - General Operating Requirements

1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

If no, please explain.

2) Are there leaking tanks?

3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank

265.194 - Inspections

1) Is the tank(s) inspected each operating day for

a) discharge control equipment

b) monitoring equipment

c) level of waste in tank

2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

3) Are there underground tanks?

If yes, how many and can they be entered for inspection?

265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

265.199 - Does it appear that incompatible wastes are being stored separate from each other?

265.16 - Personnel Training

N/A TSD completed

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

___ ___ ___

If yes, have facility personnel taken part in an annual review of training?

___ ___ ___

- 2) Is there written documentation of the following:

— job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

___ ___ ___

— type and amount of training to be given to personnel in jobs related to hazardous waste management?

___ ___ ___

— actual training or experience received by personnel?

___ ___ ___

- 3) Are training records kept on all employees for at least 3 years?

___ ___ ___

40 CFR 265 - Subpart C - Preparedness and Prevention

- 265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

— an internal communications or alarm system?

___ ___ ___

— a telephone or other device to summon emergency assistance from local authorities?

___ ___ ___

— portable fire equipment?

___ ___ ___

— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

___ ___ ___

- 265.33 Is equipment tested and maintained?

___ ___ ___

- 265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

___ ___ ___

- 265.35 Adequate aisle space?

___ ___ ___

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

___ ___ ___

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

___ ___ ___

- 1) Does the plan describe arrangements made with the local authorities?

___ ___ ___

- 2) Has the contingency plan been submitted to the local authorities?

___ ___ ___

- 3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?

___ ___ ___

- 4) Does the plan have a list of what emergency equipment is available?

___ ___ ___

- 5) Is there a provision for evacuating facility personnel?

___ ___ ___

- 6) Was there an emergency coordinator present or on call at the time of the inspection?

___ ___ ___

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards

263.10 - Does the transporter carry hazardous waste?

YES NO N/A

___ X ___

263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long?

___ X ___

___ 10 days or less

___ more than 10 days (complete TSD form)

263.20 - Manifest System

1) Does the transporter have a copy for each manifest shipment of hazardous waste?

___ ___ X

2) Does a representative portion of the manifests show the following information (if no, circle the missing information)

___ ___ ___

o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature

___ ___ ___

o Transporter's name, EPA I.D. number, signature and date of signature

___ ___ ___

o TSDF's name, address and EPA I.D. Number

___ ___ ___

and either the signature and date of the TSDF or the name, EPA I.D., signature and date of the next transporter.

___ ___ ___

o Manifest Document number

___ ___ ___

o Proper DOT shipping description

___ ___ ___

o Quantity & type of containers

___ ___ ___

(If no, to any of the above obtain copies of incomplete manifests).

3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain

___ ___ X

262.22 - Have records been kept since November 19, 1980?

___ ___ X

263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?

___ ___ X

If yes, was the incident report submitted to DOT? (obtain copy of the report)

___ ___ X

263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.

___ ___ X

N/A

General Comments:

Tunnel, Gluck, and Monocrete only transport empty drums. Mr. Ursini stated that they have a NY transporter of haz. waste permit, required for hauling empty drums that once contained haz. waste, but they do not have NY DEP transporter permits. This Co. intends to keep its haz. waste transporter status in case the regulations for transporting empty drums is ever changed.

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

YES NO N/A

40 CFR Part 265 Subpart B General Facility Standards

265.13-General Waste Analysis

- 1) Is there a detailed chemical and physical analysis of a representative sample of the waste or each waste?
(At a minimum this analysis must contain all the information necessary for proper management of the waste)

_ X _

- 2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?

You may check only one

Waste characteristics vary _____

All waste are basically the same ✓

Company treats all waste as hazardous _____

waste oil only.

- 3) Is there a written waste analysis plan at the facility?

_ X _

Does it contain the following:

- a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.
b) Test methods used to test these parameters.
c) Sampling methods to obtain a representative sample of the waste to be analyzed.
d) Frequency of repeated analysis to ensure accurate and current information.

_ _ _
_ _ _
_ _ _
_ _ _

N/A

- 4) Does hazardous waste come to this facility from an outside source? e.g. another generator.

_ X _

- 5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?

_ _ X _

265.14-Security

- 1) Is there: a) a 24-hour surveillance system? or,
b) a suitable barrier which completely surrounds the active portion of this facility?

_ X _

- 2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

_ X _

If no, explain what measures are taken for security.

Just lock doors, tractor's are alarmed, office alarmed.

265.15 - General Inspections Requirements

- 1) Does the facility have a written inspection schedule?
2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?
3) Does the owner/operator record inspections in a log?
4) Is there evidence that problems reported in the inspection log have been remedied?

_ X _
_ _ _
_ _ _
_ _ _

N/A

If no, please explain.

265.16 - Personnel Training

YES NO N/A

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

— X —

If yes, have facility personnel taken part in an annual review of training?

— — X

- 2) Is there written documentation of the following:

— job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

— — —

— type and amount of training to be given to personnel in jobs related to hazardous waste management?

— — —

— actual training or experience received by personnel?

— — —

- 3) Are training records kept on all employees for at least 3 years?

— — —

N/A

265.17-General Requirements for Ignitable, Reactive or Incompatible Wastes

- 1) Are there ignitable, reactive or incompatible waste on site?

— I not sure

If yes, what are the approximate types and quantities and location of the waste.

I'm not sure if Wst. Oil is ignitable since it was never tested.

- 2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?

— X —

If no, please explain.

no apparent precautions for waste oil storage tank.

- 3) In your opinion, are proper precautions taken so that these wastes do not:

— generate extreme heat or pressure, fire or explosion, or violent reaction?

— X —

— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?

X — —

— damage the structural integrity of the device or facility containing the waste?

X — —

— threaten human health or the environment?

— X —

This section completed for Wst. Oil.

No real precautions taken, Oil is just stored in a small horizontal tank.

40 CFR 265 - Subpart C - Preparedness and Prevention

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

- an internal communications or alarm system?
- a telephone or other device to summon emergency assistance from local authorities?
- portable fire equipment?
- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

YES NO N/A

X _ _
X _ _
X _ _
_ X _

265.33 Is equipment tested and maintained?

X _ _

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

_ _ X

265.35 Adequate aisle space?

_ _ X

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

Only waste oil on site.

_ X _

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

_ X _

- 1) Does the plan describe arrangements made with the local authorities?
- 2) Has the contingency plan been submitted to the local authorities?
- 3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?
- 4) Does the plan have a list of what emergency equipment is available?
- 5) Is there a provision for evacuating facility personnel?
- 6) Was there an emergency coordinator present or on call at the time of the inspection?

_ _ _
_ _ _
_ _ _
_ _ _
_ _ _
_ _ _

N/A

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?

If no, skip to 265.73 - Operating Record

according to mr. urcioli

_ X _

2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?

_ _ X

If not, please explain.

3) How many post-November 19 manifests does the facility have?
(Estimate if the number is large)

0

4) Does each manifest have the following information?
(circle missing information)

No manifests.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. #?
- the transporters name and EPA I.D. Number?
- the TSD name, address, telephone number & EPA I.D. Number?
- a description of the waste (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded; into or onto the transport vehicle?
- a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

—	—	—
—	—	—
—	—	—
—	—	—
—	—	—
—	—	—
—	—	—
—	—	—

N/A

(Obtain a copy of the incomplete manifests)

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?

— — X

Describe unreconciled discrepancies.

265.73 - Operating Record

1) Does the facility keep an operating record?

— X —

2) Does the record contain the following information:

- a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?
- b) The location and quantity of each hazardous waste at each location?
- c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?
- d) Summary reports and details of all incidents that require implementing the contingency plan.
- e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?
- f) Monitoring, testing or analytical data where required for:
 - Groundwater, Land Treatment, Incinerators, and Thermal Treatment?

— — X no waste received

— X —

— — X

— — X

— — X

— — X

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?

— X —

If yes, has the facility submitted an unmanifested waste report?

— — X

40 CFR 265 Subpart F - Groundwater Monitoring

YES NO N/A

(Applies only to surface impoundments, landfills and/or land treatment facilities.)

Is a groundwater monitoring plan available at the facility?

— — —

If yes, please fill out the appropriate Groundwater Monitoring Questionnaire and attach to this report.

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980?

— — —

If yes, please explain

265.112 - Closure Plan

Does the facility have a written closure plan?
(Applies to all types of TSD facilities)

— X —

If yes, does the written plan include:

1. A description of how and when the facility will be partially (if applicable) and ultimately closed?
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?
3. A description of the steps necessary to decontaminate facility equipment during closure?
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?
5. Does the owner/operator have a written estimate of the cost of closing the facility?

— — —

— — —

— — —

— — —

— — —

If yes, what is it? (\$)

265.118 - Post Closure Plan

Does the facility have a written post-closure plan?
(Applies only to disposal facilities)

— — X

If yes, Does the Plan:

1. Identify the activities which will be carried on after closure and the frequency of these activities?
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?
4. Include the name, address and phone number of a person or office to contact during post-closure?
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?

— — —

— — —

— — —

— — —

— — —

If yes, what is it? (\$)

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
Container - pg 6	Tank - pg 7	Landfill - pg 11
<u>Tank, above ground-pg 7</u>	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment- pg 12	Other _____
Waste Piles - pg 9	Land Treatment - pg 10	
Other _____	Chemical, Physical and Biological Treatment - pg 13	
	Other _____	

YES NO N/A

40 CFR 265 - Subpart I - Containers

- 1) - What type of containers are used for storage.
Describe the size, type, quantity and nature of waste
(e.g. 12 fifty-five gallon drums of waste acetone)

- 2) - Is there a containment system for spills, leaks and
precipitation?
If yes, describe.

- 265.171 - Do the containers appear to be in good condition, not in
danger of leaking?
If not, please describe the type, condition and number of
leaking or corroded containers. Be detailed and specific.

- 265.172 - Are hazardous waste stored in containers made of compatible
materials?
If not, please explain.

- 265.173(a) - Are all containers closed except those in use?
- 265.173(b) - Do containers appear to be properly opened, handled
or stored in a manner which will minimize the risk
of the container rupturing or leaking?
- 265.174 - Is the storage area inspected at least weekly?
- 265.176 - Are containers holding ignitable and reactive waste located
at least 50 feet (15 meters) away from the facility's
property line?
- 265.177 - Are incompatible wastes stored separate from each
other?
If no, explain

N/A

40 CFR 265 Subpart J - Tanks

YES NO N/A

265.190 1) What are the approximate number and size of tanks containing hazardous waste?

1 waste oil tank 250 gal capacity

2) Identify the waste treated/stored in each tank.

approx. 40-50 gals. presently stored in tank.

265.192 - General Operating Requirements

1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

YES NO N/A

If no, please explain.

Tank is used only 3 times/yr.

That is when the company's trucks are serviced.

trucks could easily back into tank and rupture it.

2) Are there leaking tanks?

YES NO N/A

3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

YES NO N/A

4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

YES NO N/A

5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank

YES NO N/A

265.194 - Inspections

1) Is the tank(s) inspected each operating day for
a) discharge control equipment
b) monitoring equipment
c) level of waste in tank

YES NO N/A

2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

YES NO N/A

3) Are there underground tanks?

YES NO N/A

If yes, how many and can they be entered for inspection?

YES NO N/A

Virgin only fuel oil, gas tanks.

265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

YES NO N/A

If no, please explain.

265.199 - Does it appear that incompatible wastes are being stored separate from each other?

YES NO N/A

TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

BARRELS AND DRUMS

85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 12, 1983

U. S. Environmental Protection Agency
Washington D.C.
20460

Attention: Mr. John Skinner
Acting Director, Office of Solid Waste

Dear Sir:

First of all I sincerely apologize for this report being late, but due to the busy Holiday season and beginning of new year activity and general confusion, I did not have time to submit this by January 10.

The reason for me sending this letter rather than just filling out the forms which were sent by your office is that the three companies listed

Tunnel Barrel & Drum Co., Inc.
Monocrete Container and Drum Co.
Gluck Barrel & Fiber Drum Co.

do not qualify as handlers, generators, storers or transporters of hazardous waste. As you can see from the information on the enclosed form #OMB:2050-0005, the only hazardous product of any kind which our three companies have come in contact with is waste oil from engines and transmissions which is accumulated in the normal servicing of our company vehicles.

I would therefore like you to remove our three companies from your list of companies which handle, generate or store hazardous wastes. Our company buys and sells used steel drums which did have hazardous waste in them but in accordance with the regulations set forth by your office, these drums are empty and not considered hazardous waste. When the regulations were first published, empty drums were considered hazardous waste and if the law was to be enforced, our company would be forced out of business. We therefore filed for the proper permits so that we did not have to close down our business. As you now know, the regulations have been changed or clarified so that an empty drum is not considered hazardous waste and we can therefore continue our operation and provide a very necessary service to the companies with which we do business.

I hope that I have shown you clearly the reason for us filing initially and why I would now like to be removed from your list of companies having hazardous waste activity. Also, after talking to Mr. Tom Piccone, U.S. EPA Region II, Permits Admin. Branch, I would like to still keep my EPA permits which would qualify me as a transporter of hazardous waste. The reason for this would be that if some time in the future the regulations would change, we would already have a permit to transport hazardous waste and our business would not suffer any interruption. If there is any other information you need or forms that have to be filled out please call and I will take care of it immediately.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

Joseph Binder Jr.

JB/cy

1981 STATUS SHEET FOR NON-REGULATED FACILITIES

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY FACILITIES THAT DID NOT TREAT, STORE, OR DISPOSE OF HAZARDOUS WASTE IN 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 FACILITY ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, complete section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

AFFIX LABEL HERE

S-I. FACILITY EPA I.D. NUMBER

T/A C
FINJD010116D111521
1 2 13 14 15

S-II. NAME OF FACILITY

TUNNEL BARRIEL & DRUM CO INC
30 69

S-III. FACILITY MAILING ADDRESS

385 TRIANGLE BLVD
15 16 45

Street or P.O. Box

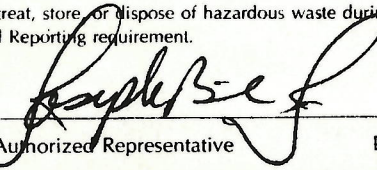
AIRLSTADT NJ 07107
15 16 41 42 47 51
City or Town State Zip Code

S-IV. 1981 STATUS (please explain your 1981 non-regulated status here)

The only hazardous waste generated by our company was 600 gal. of engine oil and transmission oil which was removed from our company vehicles in the course of normal maintenance. The oil was sold to Bill's Waste Oil Service EPA # NJ SW 56629 AB

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not treat, store, or dispose of hazardous waste during 1981 and that to the best of my knowledge this facility is not subject to the RCRA Annual Reporting requirement.

Joseph Binder Jr. Sedy. Trans.  1/12/83
Print/Type Name Title Signature of Authorized Representative Date Signed

1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a pre-printed label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

AFFIX LABEL HERE

S-I. GENERATOR'S EPA I.D. NUMBER

T/A C
F N J D I C O 1 1 6 D 1 1 1 5 2 1 1
1 2 13 14 15

S-II. NAME OF FACILITY

TUNNEL BARREL & DRUM CO INC
30 69

S-III. FACILITY MAILING ADDRESS

3185 TRAIANICIE BLVD
15 16 45

Street or P.O. Box

4 CARLSTADT
15 16
N J 0 7 1 0 7 1 2
41 42 47 51
State Zip Code

City or Town

S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

- a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981 1
- b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR §261.5) 2
- c. EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4 4
- d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR §261.2 and 40 CFR §261.6 **5**
- e. CLOSED—installation was closed prior to 1981 9

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Annual Reporting requirement.

Joseph Binder Jr. Secy-Treas. *[Signature]* 1/12/83
Print/Type Name Title Signature of Authorized Representative Date Signed

1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a pre-printed label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

AFFIX LABEL HERE

S-I. GENERATOR'S EPA I.D. NUMBER

T/A C
F N J D O 6 9 3 0 3 7 9 0 1 1
1 2 13 14 15

S-II. NAME OF FACILITY

MONOCRETE CONTAINER & DRUM CO INC 69

S-III. FACILITY MAILING ADDRESS

385 TRIANGLE BLVD 45

Street or P.O. Box

4 CARLSTADT 41 42 47 51

City or Town

State Zip Code

S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

- NON-HANDLER—did not handle hazardous waste in any quantity in 1981..... 1
- SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR §261.5) 2
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Joseph Binder Jr Secy Treas

Print/Type Name

Title

Joseph Binder Jr
Signature of Authorized Representative

1/12/83
Date Signed

1981 STATUS SHEET FOR NON-REGULATED GENERATORS

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AFFIX LABEL HERE

S-I. GENERATOR'S EPA I.D. NUMBER

T/A C
 F N J D 0 0 0 6 9 4 2 3 2 1
 1 2 13 14 15

S-II. NAME OF FACILITY

G L U C K B A R R E L & F I B R E D R U M C O
 30 69

S-III. FACILITY MAILING ADDRESS

3 8 5 T R I A N G L E B L V D
 15 16 45
 Street or P.O. Box
 A C A R L S T A D T N J 0 7 0 7 2
 15 16 41 42 47 51
 City or Town State Zip Code

S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

- NON-HANDLER—did not handle hazardous waste in any quantity in 1981 **1**
- SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR §261.5) 2
- EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4 4
- BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR §261.2 and 40 CFR §261.6 5
- CLOSED—installation was closed prior to 1981 9

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Annual Reporting requirement.

Joseph Binder Jr. Secy-Treas.
 Print/Type Name Title

Joseph Binder Jr.
 Signature of Authorized Representative

1/12/83
 Date Signed

auto repair order

REPAIR ORDER

* CODE N-NEW U-USED R-REBUILT

QTY	PART NO.	DESCRIPTION	SALES AMOUNT	COST
8	KINGS	1604HX		23.90
8	ROD BEARING SETS			88.00
1 SET	Pin's	516 STD		37.17
1 SET	Cam Bearings	424		21.15
1	Cam SHAFT	CS 414		104.60
16	LIFTERS	825		124.00
16	PUSH RODS	3132		47.20
1	HYD GASKET SET	7905		41.35
1	Cam GASKET SET	7909		17.85
1	Oil Pump KIT	224 N187		28.79
1	FLY WHEEL CUT			35.00
4	EXV 1528X	Exhaust Valve		131.20
1	SCREW	SL 6201		65.00
1	SHAFT	GEAR		25.25
1	LF 128522	FLYER		5.87
10	WASHERS	HEAD		33.33
9	19246 R	BOLT		4.23
1	15785R	COARSE		52.25
1	KEY			29
1	681761R	FLYER		7.81
1	111927R	CARD WASH		14.60
2	N1181R	THROTTLES		9.54
1	Oil Service Unit			13.90
1	268574 C	ROTOR		3.66
8	5114	Pin's		14.00
ESTIMATE AMOUNT				1012.94

30 Day Cash on Delivery
ALL REPAIRS AND PARTS
ESTIMATE TOTAL
OUTSIDE REPAIRS
REBUILT CAR
TOTAL 1798.08
95.00
1893.08
300.00

Work Authorized by X
Delivered to

00471

Phone (201) 933-1444
M & C TRUCK REPAIR
85 TRIANGLE BLVD.
CARLSTADT, N. J. 07072

NAME *Barone Barrel* DATE *4-30-57*

ORDER WRITTEN BY
ADDRESS
CITY
YEAR AND MAKE
MODEL
MOTOR NO.
SPEEDOMETER
LICENSE
PROMISED
A.M.
P.M.
Retain Parts
Destroy Parts

INSTRUCTIONS

Operation Number	INSTRUCTIONS	AMOUNT
1	Block DEGREASED	35.00
2	HEAD REBUILT	90.00
1	SET Cam Bearing INSTALL	30.00
1	SCREW INSPIRER	80.00
2	HEAD RESURFACED	35.00
8	Piston's BLASTED	38.00
7	Cyl Honed	59.75
	Machine Shop Total	347.75
	ASSY & DIS REMOVE & REINSTALL ENGINE	440.00

ACCESSORIES	AMOUNT	Total Labor
Gas, Oil, Grease	15.99	747.75
Qts. Oil		1012.94
Lbs. Grease		
Total Gas-Oil-Grease		
Outside Work		
TOTAL		1746.69
TAX		37.35
		1784.04

We warrant our work for 90 days or 1000 miles, whichever comes first. This warranty does not cover any damage caused by misuse, neglect, or accidents. We will not be held responsible for loss or damage to your car or contents while in our shop.



PLEASE PLACE LABEL IN THIS SPACE

III LOCATION OF INSTALLATION

COMMENTS

CONTINUE ON REVERSE

5	6	7	8	9	10	11	12	13	14	15
W	N	S	D	0	0	6	9	4	2	3
1	2	3	4	5	6	7	8	9	10	11

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 1 7					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 2 2 0					
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Joseph Binder, Sec. Treas.

8/15/80

EPA Form 8700-12 (6-80) REVERSE

Wastes generated at this facility are subject to the Small Quantity Generators Exemption of Part 261.5.

ELLIOT L. SHAPIRO, P.E., CHARLES M. SHAPIRO & SONS, P.C., CONSULTING ENGINEERS,
615 COURT STREET, BROOKLYN, NEW YORK 11231 212 596-1902

TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

BARRELS AND DRUMS

85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 12, 1983

U. S. Environmental Protection Agency
Washington D.C.
20460

Attention: Mr. John Skinner
Acting Director, Office of Solid Waste

Dear Sir:

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The reason for me sending this letter rather than just filling out the forms which were sent by your office is that the three companies listed

Tunnel Barrel & Drum Co., Inc. - NJ9001601152
Monocrete Container and Drum Co. - NJD069303790
Gluck Barrel & Fiber Drum Co. - NJD000694232

do not qualify as handlers, generators, storers or transporters of hazardous waste. As you can see from the information on the enclosed form #OMB:2050-0005, the only hazardous product of any kind which our three companies have come in contact with is waste oil from engines and transmissions which is accumulated in the normal servicing of our company vehicles.

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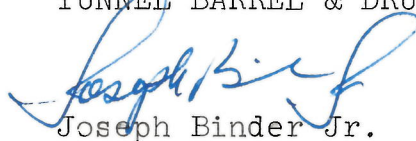
REPORT RECEIVED
JAN 28 11 33 AM '83
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10001

delete
C1101, C1103
JH
HWSMS
2/9/83
LBO

I hope that I have shown you clearly the reason for us filing initially and why I would now like to be removed from your list of companies having hazardous waste activity. Also, after talking to Mr. Tom Piccone, U.S. EPA Region II, Permits Admin. Branch, I would like to still keep my EPA permits which would qualify me as a transporter of hazardous waste. The reason for this would be that if some time in the future the regulations would change, we would already have a permit to transport hazardous waste and our business would not suffer any interruption. If there is any other information you need or forms that have to be filled out please call and I will take care of it immediately.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

A handwritten signature in blue ink, appearing to read "Joseph Binder Jr.", is written over the typed name.

Joseph Binder Jr.

JB/cy

CHARLES M. SHAPIRO AND SONS, P.C.
CONSULTING ENGINEERS

615 COURT STREET, BROOKLYN, N. Y. 11231

(212) 598-1902

80-152

ENVIRONMENTAL ENGINEERING

FACILITIES ENGINEERING

CRANE & RIGGING ENGINEERING

Charles M. Shapiro, P.E. 1946-1968

Howard I. Shapiro, P.E.

Elliot J. Shapiro, P.E.

November 19, 1980

New Woodbridge Barrel Co., Inc.
28 Peerless Place
Newark, New Jersey 07114

NGD 000694232

Gentlemen:

Enclosed is a copy of the RCRA Permit Request submitted to
the U.S.E.P.A. this date.

Upon receipt of an application package from EPA, please ad-
vise me.

Yours truly,

ELLIOT J. SHAPIRO, P.E.

EJS:LS
Enc.

cc: CIA

NEW YORK, N.Y. 10007
JUN 1 1981
ENY
10007
ACTION

CHARLES M. SHAPIRO AND SONS, P.C.
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Elliot J. Shapiro, P.E.

November 19, 1980

U. S. Environmental Protection Agency, Region 2
Information Service Center
26 Federal Plaza
Manhattan, New York 10007

Subject: REQUEST FOR RCRA PERMIT FOR A TREATMENT, STORAGE
OR DISPOSAL FACILITY

REF.: (1) The New Woodbridge Barrel Co., Inc.
28 Peerless Place
Newark, New Jersey 07114

EPA I.D. # NOT RECEIVED

Gentlemen:

It is requested that a permit to treat, store or dispose be
issued to the above indicated existing establishment. A request
for "Part A" has been submitted and will be submitted upon
receipt.

Yours Truly,

ELLIOT J. SHAPIRO, P.E.
ENGINEER FOR THE PERMITTEE

EJS:LS

cc: New Woodbridge
C.I.A.

RECEIVED
JUN 1 1981
NEW YORK, N.Y. 10007
SECTION

U. S. Environmental Protection Agency, Region 2
Information Service Center
26 Federal Plaza
Manhattan, New York 10007

Subject: Request for RCRA Permit to Transport, Treat, Store or
Dispose

Gentlemen:

Enclosed are permit requests for the following establishments:

Handwritten: TSD, G/T, No Part A.

National Drum & Barrel Corp., 35 Beadel St., Brooklyn, N. Y. NY D0476990616 TRA
H. M. Roberts Steel Drum, 157 Spencer St., Brooklyn, N. Y. NY D000708149-0 TRA
Phoenix Cooperage Co., Inc., 292 Scholes St., Brooklyn, N. Y. NY D0862239306 TRA
Goodman Bros. Steel Drum Co., Inc., 18 Division Place, Brooklyn, N. Y. NY D04768377
Acme Albert Steel Drum Inc., 1050 Grand St., Brooklyn, N. Y. NY D000390716-0 TRA
Tunnel Barrel & Drum Co., Inc., 85 Triangle Blvd., Carlstadt, N. J. NJ D00160115
Gluck Barrel & Drum Co., 85 Triangle Blvd., Carlstadt, N. J. NJ D000694232 NOLTR
Monocrete Container & Drum, Inc., 85 Triangle Blvd., Carlstadt, N. J. NJ D0693037
New Woodbridge Barrel Co., Inc., 28 Peerless Place, Newark, N. J. NJ D011743762

Yours truly,

Handwritten signature of Elliot J. Shapiro

ELLIOT J. SHAPIRO, P.E.
ENGINEER FOR THE PERMITTEE

EJS:LS

cc: The New Woodbridge Barrel Co., Inc.

Letter sent Lely TSD

Never got in

Handwritten: No LTR

Stamp: JUN 3 1981
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, N.Y. 10001

INSTALLATION'S EPA I.D. NUMBER																
S															T/A C	P/S
F															3 8	6
1	2												13	14	15	72

NOT RECEIVED

COMPLETE

NAME: PRESS HARD WHEN FILLING IN NAME & ADDRESS.

THE NEW WOODBRIDGE BARREL CO., INC.

STREET ADDRESS:

28 PEERLESS PLACE

CITY, STATE, & ZIP CODE:

NEWARK, N. J. 07114

REGION NO.
 DATE RECEIVED
 DATE MAILED

OFFICIAL USE ONLY

PULL HERE

INSTRUCTIONS FOR COMPLETING THIS POSTCARD

Installation's EPA I.D. Number — If you were included in EPA's Mass mailing of notification packets or if you have filed a notification with EPA and have received an Acknowledgement of Notification of Hazardous Waste Activity enter your Installation's EPA I.D. Number in these boxes (*one letter or number per box*). Otherwise, leave this item blank.

Mailing Label — Enter the name and address where you want EPA to send your Part A packet (*Form 1 and Form 3 of the Consolidated Permits Application*). DO NOT remove label, leave attached to postcard.

After completing the postcard, detach it, affix the proper first class postage, and mail. For your own records, you may enter the date the postcard is mailed to EPA. Retain this portion for your records.

11/19/80

DATE MAILED

NEW YORK, N.Y. 10007
 ACTION
 11/19/80

80-152 No. 878351

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO U.S. Env. Protection
Agency, Region 2
STREET AND NO.
26 Federal Plaza
P.O., STATE AND ZIP CODE
Manhattan, N. Y. 10007

POSTAGE

CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	\$.50
	SPECIAL DELIVERY	1.45
	RESTRICTED DELIVERY	
	SHOW TO WHOM DATE DELIVERED	
	SHOW TO WHOM DATE DELIVERED	
OPTIONAL SERVICES	RETURN RECEIPT SERVICE	
	DELIVERED WITH RESTRICTED DELIVERY	
	SHOW TO WHOM ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	
TOTAL POSTAGE AND FEES		\$ 1.95
POSTMARK OR DATE		

PS Form 3800, Apr. 1976

JUN 3 9 03 AM '81
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

RCRA INSPECTION FORM

(2)

Report Prepared for:

Generator ☒

Transporter ☒

HWM (TSD) facility ☒

Copy of report sent to the facility ☐

(20)

Facility Information

Name: Gluck Barrel & Drum Co.

Address: 85 Triangle Blvd.
Carlstadt, NJ

EPA ID#: 1450084009371

Date of Inspection: 1-25-83

Participating Personnel

State or EPA Personnel: Alphonse Iannuzzi, Jr.

Facility Personnel: ① Anthony Urcioli,
President, ② Joseph Binder, Secretary & Treasurer

Report Prepared by Name: Alphonse Iannuzzi, Jr.

Agency: DEP

Telephone #: 201-648-3664

Approved for the Director by: _____

Summary of Findings

Facility Description and Operations

Gluck Barrel & Drum Co. (NJ0000694232), Tunnel Barrel & Drum Co. Inc. (NJ0001601152), and Manacrete Containers Co., Inc. (NJ00069303790) are all the same company operating out of one building on 85 Triangle Blvd. Carlstadt, NJ. All three registered as a Gen, Trans, & TSDF. The reason for having all three co's listed at the same address is due to Tunnel buying out Gluck and Manacrete. Since Tunnel didn't want to lose any of the other two company's customers they kept their names. Since they maintain Gluck and Manacrete's names they also registered all three company's for hazardous waste activity.

This company is a drum reconditioner of ^{empty} fiber pack drums. Used fiber pack drums are bought from customers, washed, wiped, or steamed out (wash water is discharged to Bergen County utilities Authority Little Ferry, NJ. sewage treatment plant), painted, and sold to customers as reconditioned drums. Empty metal and plastic drums are received, categorized according to size and type, and sold to drum reconditioners. No cleaning of these drums occur on site. Metal drums are sold to ① Acme Albert 1050 Grand Ave. Brooklyn, NY, ② Jacob Kline Cooperage Allentown, PA., and ③ Central steel Drum Newark, NJ. Plastic drums are sold to State steel Drum Co. Camden, NJ. Some of the empty metal drums received once contained hazardous waste, other drums on noted on site had Corrosive and Flammable labels on them. Tunnel registered as a Gen, Trans, TSDF, due to recommendations

Facility Name

Gluck Barrel

EPA ID No.

1150084009372

Comments, observations, summary

A-2

Date of Inspection 1-25-83

HW/EF NO.

from their lawyers. After they realized that the regulations (RCRA) did not include empty drums they had already registered with EPA. Attached is a letter from Mr. Binder representing all three companies to EPA Washington, D.C. ⁽¹⁻¹²⁻⁸³⁾ accompanying an EPA 1981 status sheet for non-regulated generators (for all 3 companies) and a facility form (for Tunnel). This letter states that all three companies would like to remove their General TSD status and keep their trans. status.

Three 30 gal. drums of caustic spill cleanup material were accumulated in 3/81. This spill was noted during an initial RCRA inspection of Tunnel by me on 3/9/81 (see pg. B). Tunnel does not have a manifest for these drums and stated that Barone Barrel & Drum Paterson, NJ removed these drums sometime in 4/81. Without a manifest Tunnel used to have a truck repair outfit operating out of the same building "M & C Trucking". Barone had brought one of its trucks in for repair and Tunnel had deducted the price for disposing of these drums from the repair bill ^{\$300} (see attached repair bill dated 4-30-81). Mr. Urciali stated that Barone never left a manifest because he did not have a form on his truck. He never brought back a form to Tunnel. Tunnel had reportedly tried to obtain a manifest from Barone, but could not contact him by phone. Mr. Urciali stated that someone by the name of Terrats was contacted at Barone, but he did not know his exact address. He said that a few weeks after this shipment he had read about Barone getting in trouble with the state in a newspaper.

Alphonse Longo
Signature of Inspector

Signature of Facility Representative

Facility Name

Gluck Barrel

A-3

Date of inspection 1-25-83

EPA ID No.

HW/EF No.

NJ0084009372

Comments, observations, summary

Mr. Urcioli was told that this shipment was in violation of both DEP & EPA's regulations.

Facility Inspection

The facility inspection indicated that there were empty fiber and metal drums stored inside of the building. Some metal and plastic drums were stored outside of the building in an alley between their building and the next building north of Tunnel. A spill, approx. 12'x3', of a brown-yellow material ^{on asphalt} in a puddle of water in this alley was noted. Mr. Urcioli determined that this was paint used to paint fiber drums. He had one of his men put saw dust on it during the inspection. Mr. Urcioli was told that any spill residue from drums labeled flammable, corrosive, or any other potentially hazardous material must be cleaned up and placed into a drum immediately. He agreed to do this.

Mr. Binder stated that he will send a letter to me concerning the disposal of the caustic spill material sent to Barone and also include this copy with the NJDEP annual manifest report.

Alphonse Longi
Signature of Inspector

Signature of Facility Representative

Describe the activities that result in the generation of hazardous waste.

The only haz. waste generated at this facility on a regular basis is waste crankcase oil from servicing their trucks (N.J. HAZ. waste as of 1-83).

During an 3/9/81 initial RCRA inspection of Tunnel Barrel & Drum a spill of caustic material (determined to be caustic by ^{inspectors} pH paper test) was noted on soil. Three 30 gal. drums of contaminated soil were generated from this cleanup. This is the only other waste produced.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

Only 50 gals. of waste crank-case oil is stored in a 250 gal. capacity storage tank. This oil is removed by Bills Waste Oil 430 Ridge Rd. Lyndhurst, N.J. N.J. SWA transporter permit # S-6629AB to BIL Oil Newark, N.J.

Tunnel does not have any receipts for the removal of waste oil on file. They did have Bills Waste Oil's permit #, address, etc. written on a blank Bills Waste oil receipt.

The waste oil tank is stored out side of the building. This tank was unlabeled, stored on asphalt, had no protection from vehicles backing into it, and had some spillage at its base (sludge - small amount). Mr. Ursicli stated that the spillage will be cleaned up and a barrier protecting the tank will be installed. The words "waste oil" were written on the tank in red paint during the inspection. Mr. Ursicli was informed of N.J.'s new waste oil regulations and was told to call DEP at 609-292-5552 for a copy of these reg's.

Is there reason to believe that the facility has hazardous waste on-site?

- a. If yes, what leads you to believe it is hazardous waste?
Check appropriate boxes:

- ☐ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☒ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) *waste oil is a not haz. waste.*

Mr. Urcioli stated that His Co. does not Gen, Trans, or Tsp. hazardous waste. See comments section.

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

262.11 - Hazardous waste determination

1) Did the generator test its waste to determine whether it is hazardous?

Is the waste hazardous?

2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

YES NO N/A

company states it does
not Gen. haz. waste.
X X X

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

X

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

to Barone Barrel & Drum Co. Paterson, NJ. One unmanifested shipment of high pH spill cleanup material. Three ~250 gal. waste oil shipments.

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. Number?
- the transporters name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

N/A
no manifest used for one spill cleanup shipment of waste oil

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

X

262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?

X

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

X

No manifest used for shipment of spill cleanup material noted during the 3/9/81 RCRA inspection performed at Tunnel Barrel & Drum. Waste oil is not manifested.

YES NO N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) _ _ _
- 2) Label each package according to DOT (i.e., 49 CFR 172) _ _ _
- 3) Mark each package according to DOT (i.e., 49 CFR 172) _ _ _
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generators name, address and manifest document number. (i.e., 49 CFR 172.304) _ _ _

10/4

262.34 Accumulation Time

1) How is waste accumulated on-site?

☐ Containers

☒ Tanks *Waste oil tank, one 250 gal. tank.*

☐ Surface impoundments (complete EWMF checklist)

☐ Piles (complete EWMF checklist)

2) Is waste accumulated for more than 90 days?

X
waste oil

If yes, complete EWMF checklist

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?

 X

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?

 X
tank only

Tank not labeled.

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

TSD Checklist is completed.

Note:

Since this co. does not gen. > 1001 gals. waste oil within a 90 day period or even in a year, they do not have to maintain manifest records for waste oil only shipping documents or receipts have to be maintained as 1-83.

N/A TSD completed

262.34 - SHORT TERM ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 263 - Subpart I Containers

YES NO N/A

265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).

265.171 - Do the containers appear to be in good condition, not in danger of leaking?

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

265.172 - Are hazardous waste stored in containers made of compatible materials?

If not, please explain.

265.173(a) - Are all containers closed except those in use?

265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

265.174 - Is the storage area inspected at least weekly?

265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?

265.177 - Are incompatible waste stored separate from each other?

N/A TSD - completed.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
<u>40 CFR 265 Subpart J - Tanks</u>			
265.190 1) What are the approximate number and size of tanks containing hazardous waste?	_____	_____	_____
2) Identify the waste treated/stored in each tank.			
<u>265.192 - General Operating Requirements</u>			
1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	_____	_____	_____
If no, please explain.			
2) Are there leaking tanks?	_____	_____	_____
3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	_____	_____	_____
4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	_____	_____	_____
5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank	_____	_____	_____
<u>265.194 - Inspections</u>			
1) Is the tank(s) inspected each operating day for			
a) discharge control equipment	_____	_____	_____
b) monitoring equipment	_____	_____	_____
c) level of waste in tank	_____	_____	_____
2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?	_____	_____	_____
3) Are there underground tanks?	_____	_____	_____
If yes, how many and can they be entered for inspection?	_____	_____	_____
265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	_____	_____	_____
If no, please explain.			
265.199 - Does it appear that incompatible wastes are being stored separate from each other?	_____	_____	_____

265.16 - Personnel Training

N/A TSD completed

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

— — —

If yes, have facility personnel taken part in an annual review of training?

— — —

- 2) Is there written documentation of the following:

— job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

— — —

— type and amount of training to be given to personnel in jobs related to hazardous waste management?

— — —

— actual training or experience received by personnel?

— — —

- 3) Are training records kept on all employees for at least 3 years?

— — —

40 CFR 265 - Subpart C - Preparedness and Prevention

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

— an internal communications or alarm system?

— — —

— a telephone or other device to summon emergency assistance from local authorities?

— — —

— portable fire equipment?

— — —

— water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

— — —

265.33 Is equipment tested and maintained?

— — —

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

— — —

265.35 Adequate aisle space?

— — —

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

— — —

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

— — —

- 1) Does the plan describe arrangements made with the local authorities?

— — —

- 2) Has the contingency plan been submitted to the local authorities?

— — —

- 3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?

— — —

- 4) Does the plan have a list of what emergency equipment is available?

— — —

- 5) Is there a provision for evacuating facility personnel?

— — —

- 6) Was there an emergency coordinator present or on call at the time of the inspection?

— — —

Transporter Inspection Report Form

40 CFR Part 263 Transporter Standards

YES NO N/A

263.10 - Does the transporter carry hazardous waste?

___ X ___

263.12 - Does the transporter store hazardous waste at a transfer facility - if yes, how long?

___ X ___

___ 10 days or less
___ more than 10 days (complete TSD form)

263.20 - Manifest System

1) Does the transporter have a copy for each manifest shipment of hazardous waste?

___ ___ X

2) Does a representative portion of the manifests show the following information (if no, circle the missing information)

___ ___ ___

o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature

___ ___ ___

o Transporter's name, EPA I.D. number, signature and date of signature

___ ___ ___

o TSD's name, address and EPA I.D. Number

___ ___ ___

and either the signature and date of the TSD or the name, EPA I.D., signature and date of the next transporter.

___ ___ ___

o Manifest Document number

___ ___ ___

o Proper DOT shipping description

___ ___ ___

o Quantity & type of containers

___ ___ ___

(If no, to any of the above obtain copies of incomplete manifests).

N/A

3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain

___ ___ X

262.22 - Have records been kept since November 19, 1980?

___ ___ X

263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?

___ ___ X

If yes, was the incident report submitted to DOT? (obtain copy of the report)

___ ___ X

263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.

___ ___ X

General Comments:

Tunnel, Gluck, and Monocrete only transport empty drums. Mr. Uncial stated that they have a NY transporter of haz. waste permit, required for hauling empty drums that once contained haz. waste, but they do not have NY DEP transporter permits. This Co. intends to keep its haz. waste transporter status in case the regulations for transporting empty drums is ever changed.

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST
(Facilities Subject to 40 CFR 265 Standards)

YES NO N/A

40 CFR Part 265 Subpart B General Facility Standards

265.13-General Waste Analysis

- 1) Is there a detailed chemical and physical analysis of a representative sample of the waste or each waste?
(At a minimum this analysis must contain all the information necessary for proper management of the waste)

_ X _

- 2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?
You may check only one

Waste characteristics vary _____

All waste are basically the same ✓

Company treats all waste as hazardous _____

waste oil only.

- 3) Is there a written waste analysis plan at the facility?

_ X _

Does it contain the following:

- a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.
b) Test methods used to test these parameters.
c) Sampling methods to obtain a representative sample of the waste to be analyzed.
d) Frequency of repeated analysis to ensure accurate and current information.

_ _ _ } *N/A*
_ _ _
_ _ _
_ _ _

- 4) Does hazardous waste come to this facility from an outside source? e.g. another generator.

_ X _

- 5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?

_ _ X

265.14-Security

- 1) Is there: a) a 24-hour surveillance system? or,

b) a suitable barrier which completely surrounds the active portion of this facility?

_ X _

- 2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

_ X _

If no, explain what measures are taken for security.

Just lock doors, tractor's are alarmed, office alarmed.

265.15 - General Inspections Requirements

- 1) Does the facility have a written inspection schedule?

_ X _

- 2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?

_ _ _

- 3) Does the owner/operator record inspections in a log?

_ _ _

- 4) Is there evidence that problems reported in the inspection log have been remedied?

_ _ _

If no, please explain.

} *N/A*

265.16 - Personnel Training

YES NO N/A

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

— X —

If yes, have facility personnel taken part in an annual review of training?

— — X

- 2) Is there written documentation of the following:

— job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

— — —

— type and amount of training to be given to personnel in jobs related to hazardous waste management?

— — —

— actual training or experience received by personnel?

— — —

- 3) Are training records kept on all employees for at least 3 years?

— — —

N/A

265.17 - General Requirements for Ignitable, Reactive or Incompatible Wastes

- 1) Are there ignitable, reactive or incompatible waste on site?

— P not sure

If yes, what are the approximate types and quantities and location of the waste.

I'm not sure if Wst. Oil is ignitable since it was never tested.

- 2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive wastes?

— X —

If no, please explain.

No apparent precautions for waste oil storage tank.

- 3) In your opinion, are proper precautions taken so that these wastes do not:

— generate extreme heat or pressure, fire or explosion, or violent reaction?

— X —

— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?

X — —

— damage the structural integrity of the device or facility containing the waste?

X — —

— threaten human health or the environment?

— X —

This section completed

for

Wst. Oil.

No real precautions taken. Oil is just stored in a small horizontal tank.

40 CFR 265 - Subpart C - Preparedness and Prevention

YES NO N/A

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

- an internal communications or alarm system?
- a telephone or other device to summon emergency assistance from local authorities?
- portable fire equipment?
- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

X _ _
X _ _
X _ _
_ X _

265.33 Is equipment tested and maintained?

X _ _

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

_ _ X

265.35 Adequate aisle space?

_ _ X

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

Only waste oil on site.

_ X _

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

_ X _

- 1) Does the plan describe arrangements made with the local authorities?
- 2) Has the contingency plan been submitted to the local authorities?
- 3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?
- 4) Does the plan have a list of what emergency equipment is available?
- 5) Is there a provision for evacuating facility personnel?
- 6) Was there an emergency coordinator present or on call at the time of the inspection?

_ _ _
_ _ _
_ _ _
_ _ _
_ _ _
_ _ _

N/A

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?

If no, skip to 265.73 - Operating Record

according to Mr. Urcioli

_ X _

2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?

_ _ X

If not, please explain.

3) How many post-November 19 manifests does the facility have?
(Estimate if the number is large)

0

4) Does each manifest have the following information?
(circle missing information)

No manifests,

— a manifest document number?

— the generators name, mailing address, telephone number and EPA I.D. #?

— the transporters name and EPA I.D. Number?

— the TSD name, address, telephone number & EPA I.D. Number?

— a description of the waste (DOT)?

— the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded; into or onto the transport vehicle?

— a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

(Obtain a copy of the incomplete manifests)

—	—	—
—	—	—
—	—	—
—	—	—
—	—	—
—	—	—
—	—	—
—	—	—

N/A

265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?

Describe unreconciled discrepancies.

— — X

265.73 - Operating Record

1) Does the facility keep an operating record?

— X —

2) Does the record contain the following information:

a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal?

— — X. no waste received

b) The location and quantity of each hazardous waste at each location?

— X —

c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan?

— — X

d) Summary reports and details of all incidents that require implementing the contingency plan.

X

e) Records and results of inspections for the past 3 years or November 19, 1980 which ever is less?

— — X

f) Monitoring, testing or analytical data where required for:

Groundwater, Land Treatment, Incinerators, and Thermal Treatment?

— — X

265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?

— X —

If yes, has the facility submitted an unmanifested waste report?

— — X

40 CFR 265 Subpart F - Groundwater Monitoring

YES NO N/A

(Applies only to surface impoundments, landfills and/or land treatment facilities.)

Is a groundwater monitoring plan available at the facility?

— — —

If yes, please fill out the appropriate Groundwater Monitoring Questionnaire and attach to this report.

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980?

— — —

If yes, please explain

265.112 - Closure Plan

Does the facility have a written closure plan?
(Applies to all types of TSD facilities)

— X —

If yes, does the written plan include:

1. A description of how and when the facility will be partially (if applicable) and ultimately closed?
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?
3. A description of the steps necessary to decontaminate facility equipment during closure?
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed?
5. Does the owner/operator have a written estimate of the cost of closing the facility?

— — —

— — —

— — —

— — —

— — —

If yes, what is it? (\$)

265.118 - Post Closure Plan

Does the facility have a written post-closure plan?
(Applies only to disposal facilities)

— — X

If yes, Does the Plan:

1. Identify the activities which will be carried on after closure and the frequency of these activities?
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure?
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure?
4. Include the name, address and phone number of a person or office to contact during post-closure?
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility?

— — —

— — —

— — —

— — —

— — —

If yes, what is it? (\$)

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
Container - pg 6	Tank - pg 7	Landfill - pg 11
<u>Tank, above ground-pg 7</u>	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment-pg 12	Other _____
Waste Piles - pg 9	Land Treatment - pg 10	
Other _____	Chemical, Physical and Biological Treatment - pg 13	
	Other _____	

YES NO N/A

40 CFR 265 - Subpart I - Containers

- 1) - What type of containers are used for storage.
Describe the size, type, quantity and nature of waste
(e.g. 12 fifty-five gallon drums of waste acetone)
- 2) - Is there a containment system for spills, leaks and precipitation?
If yes, describe. _____
- 265.171 - Do the containers appear to be in good condition, not in danger of leaking?
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific. _____
- 265.172 - Are hazardous waste stored in containers made of compatible materials?
If not, please explain. _____
- 265.173(a) - Are all containers closed except those in use? _____
- 265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking? _____
- 265.174 - Is the storage area inspected at least weekly? _____
- 265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line? _____
- 265.177 - Are incompatible wastes stored separate from each other?
If no, explain _____
- N/A

40 CFR 265 Subpart J - Tanks

YES NO N/A

265.190 1) What are the approximate number and size of tanks containing hazardous waste?

1 waste oil tank 250 gal capacity

approx. 40-50 gals. presently stored in tank.

265.192 - General Operating Requirements

1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

— X —

If no, please explain.

2) Are there leaking tanks?

— X —

3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

X — —

4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

— — X

5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank

— — X

265.194 - Inspections

1) Is the tank(s) inspected each operating day for

a) discharge control equipment

b) monitoring equipment

c) level of waste in tank

— Y —
— X —
— X —

2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

— X —

3) Are there underground tanks?

— X —

If yes, how many and can they be entered for inspection?

— — X

265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

— X —

If no, please explain.

265.199 - Does it appear that incompatible wastes are being stored separate from each other?

— — X

Tank is used only 3 times/yr.

That is when the company's trucks are serviced.

trucks could easily back into tank and rupture it.

Virgin only fuel oil, gas tanks.

TUNNEL BARREL & DRUM CO., INC.

DEALERS IN NEW & USED

BARRELS AND DRUMS

85 TRIANGLE BOULEVARD

CARLSTADT, N. J. 07072

January 12, 1983

U. S. Environmental Protection Agency
Washington D.C.
20460

Attention: Mr. John Skinner
Acting Director, Office of Solid Waste

Dear Sir:

First of all I sincerely apologize for this report being late, but due to the busy Holiday season and beginning of new year activity and general confusion, I did not have time to submit this by January 10.

The reason for me sending this letter rather than just filling out the forms which were sent by your office is that the three companies listed

Tunnel Barrel & Drum Co., Inc.
Monocrete Container and Drum Co.
Gluck Barrel & Fiber Drum Co.

do not qualify as handlers, generators, storers or transporters of hazardous waste. As you can see from the information on the enclosed form #OMB:2050-0005, the only hazardous product of any kind which our three companies have come in contact with is waste oil from engines and transmissions which is accumulated in the normal servicing of our company vehicles.

I would therefore like you to remove our three companies from your list of companies which handle, generate or store hazardous wastes. Our company buys and sells used steel drums which did have hazardous waste in them but in accordance with the regulations set forth by your office, these drums are empty and not considered hazardous waste. When the regulations were first published, empty drums were considered hazardous waste and if the law was to be enforced, our company would be forced out of business. We therefore filed for the proper permits so that we did not have to close down our business. As you now know, the regulations have been changed or clarified so that an empty drum is not considered hazardous waste and we can therefore continue our operation and provide a very necessary service to the companies with which we do business.

I hope that I have shown you clearly the reason for us filing initially and why I would now like to be removed from your list of companies having hazardous waste activity. Also, after talking to Mr. Tom Piccone, U.S. EPA Region II, Permits Admin. Branch, I would like to still keep my EPA permits which would qualify me as a transporter of hazardous waste. The reason for this would be that if some time in the future the regulations would change, we would already have a permit to transport hazardous waste and our business would not suffer any interruption. If there is any other information you need or forms that have to be filled out please call and I will take care of it immediately.

Sincerely,

TUNNEL BARREL & DRUM CO., INC.

Joseph Binder Jr.

JB/cy

1981 STATUS SHEET FOR NON-REGULATED FACILITIES

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY FACILITIES THAT DID NOT TREAT, STORE, OR DISPOSE OF HAZARDOUS WASTE IN 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 FACILITY ANNUAL REPORT. If you received a preprinted label attached to the envelope in which this form was enclosed, affix it in the space provided, complete section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

AFFIX LABEL HERE

S-I. FACILITY EPA I.D. NUMBER

T/A C
E N J D 0 0 1 6 D 1 1 5 2 1
1 2 13 14 15

S-II. NAME OF FACILITY

T U N N E L B A R R E L & D R U M C O I N C
30 69

S-III. FACILITY MAILING ADDRESS

3 8 5 T R I A N G L E B L V D
15 16 45

Street or P.O. Box

4 C A R L S T A D I T
15 16 41 42 47 51

City or Town

State Zip Code

S-IV. 1981 STATUS (please explain your 1981 non-regulated status here)

The only hazardous waste generated by our company was 600 gal. of engine oil and transmission oil which was removed from our company vehicles in the course of normal maintenance. The oil was sold to Bill's Waste Oil Service EPA # NS SWNS 6629 AB

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not treat, store, or dispose of hazardous waste during 1981 and that to the best of my knowledge this facility is not subject to the RCRA Annual Reporting requirement.

Joseph Binder Jr. Secy. Treas. 1/12/83
Print/Type Name Title Signature of Authorized Representative Date Signed

1981 STATUS SHEET FOR NON-REGULATED GENERATORS

INSTRUCTIONS: THIS SHEET MUST BE COMPLETED ONLY BY INSTALLATIONS THAT NOTIFIED EPA OF HAZARDOUS WASTE ACTIVITY UNDER SECTION 3010 OF RCRA BUT DID NOT HANDLE REGULATED QUANTITIES OF HAZARDOUS WASTE AT ANY TIME DURING 1981 AND ARE NOT REQUIRED TO COMPLETE THE 1981 GENERATOR ANNUAL REPORT. If you received a pre-printed label attached to the envelope in which this form was enclosed, affix it in the space provided, circle the appropriate code in section S-IV, sign the certification at the bottom of this page and return it to your EPA Regional Office by January 10, 1983 in the return envelope provided. If any of the information on the label is incorrect, draw a line through it and provide the correct information in the appropriate section below. If you did not receive a preprinted label, complete all sections.

AFFIX LABEL HERE

S-I. GENERATOR'S EPA I.D. NUMBER

T/A C

1 2 13 14 15
NJ 1010116101115211

S-II. NAME OF FACILITY

30 69
TWINNIELE BARRELL & DRUM CO INC

S-III. FACILITY MAILING ADDRESS

15 16 45
315 TIRIANCIE BLVD

Street or P.O. Box

15 16
CARLSITADI

City or Town

41 42 47 51
NJ 07072
State Zip Code

S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

- a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981 1
- b. SMALL QUANTITY GENERATOR—did not generate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) in any single month or accumulate more than 1000 kg. of hazardous waste (or 1 kg. of acutely hazardous waste) on-site at any time during 1981 (40 CFR §261.5) 2
- c. EXEMPT—all wastes generated in farming operations (40 CFR §262.51) or exempt pursuant to 40 CFR §261.4 4
- d. BENEFICIAL USE—All hazardous waste generated was beneficially used, reused, or recycled in accordance with 40 CFR §261.2 and 40 CFR §261.6 (5)
- e. CLOSED—installation was closed prior to 1981 9

S-V. CERTIFICATION

I certify under penalty of law that the installation identified above did not handle regulated quantities of hazardous waste during 1981 and that to the best of my knowledge this installation is not subject to the RCRA Annual Reporting requirement.

Joseph Binder Jr. Secy-Treas.

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

1/12/83

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AFFIX LABEL HERE

S-I. GENERATOR'S EPA I.D. NUMBER

T/A C
 NJ 10691303790 1
 1 2 13 14 15

S-II. NAME OF FACILITY

MONOCRETE CONTAINER & DRUM CO INC 30 69

S-III. FACILITY MAILING ADDRESS

85 TRIANGLE BLVD 15 16 45

Street or P.O. Box

ACARLSTADT 15 16 NJ 07072 41 42 47 51

City or Town

State Zip Code

S-IV. 1981 STATUS (Circle the code at right which best describes your installation's 1981 status. Circle only one code)

- a. NON-HANDLER—did not handle hazardous waste in any quantity in 1981 1
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Joseph Binder Jr

Print/Type Name

Secy Treas

Title

Joseph Binder Jr

Signature of Authorized Representative

1/12/83

Date Signed

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F N J D 0 0 0 6 9 4 2 3 2 1
1 2 13 14 15

S-II. NAME OF FACILITY

G L U C K B A R R E L & F I B R E D R U M C O
30 69

S-III. FACILITY MAILING ADDRESS

3 8 5 T R I A N G L E B L V D
15 16 45

Street or P.O. Box

A R L S T A D T N J 0 7 0 7 2
15 16 41 42 47 51
City or Town State Zip Code

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Joseph Binder Jr. Secy-Treas.

Print/Type Name

Title

Signature of Authorized Representative

Date Signed

1/12/83

